

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

ANGEL FELICIANO HERNÁNDEZ,

Plaintiff,

v.

MIGUEL A. PEREIRA CASTILLO, et al.

Defendants.

CIVIL NO. 09-1569(PG)

MOTION REQUESTING EXTENSION OF TIME
TO ANSWER COMPLAINT OR OTHERWISE PLEAD

TO THE HONORABLE COURT:

COMES NOW, defendant Zoé M. Laboy Alvarado (hereinafter "Defendant"), without submitting to the Court's jurisdiction and through the undersigned attorney who appears for the sole purpose of this motion, and respectfully avers and prays as follows:

1. On July 16, 2009, the appearing defendant was served with summons in the instant case. The Court granted the appearing defendant until September 4, 2009 to answer the complaint.
2. The appearing defendant requested legal representation to the Department of Justice. The Law 9 Division of the Department of Justice received defendant's request, has investigated the same, and has recently granted legal representation benefits.
3. The above-referenced case has been recently assigned to the undersigned. As such, the undersigned is conducting the necessary research and investigation regarding the allegations contained in the Complaint.
4. In order to submit a responsible answer to the complaint or otherwise plead, the

appearing defendant requests an extension of twenty (20) days to answer the complaint or otherwise plead. Said period will expire on September 23, 2009.

5. The instant request is not intended to unduly delay these proceedings. It only serves the legitimate interest of having the necessary time to responsibly investigate relevant facts and to submit a response to the complaint.

WHEREFORE, defendant respectfully requests that this Honorable Court grant defendant's instant motion for an extension of time of twenty (20) days, that is, until September 23, 2009, to answer or otherwise plead.

I HEREBY CERTIFY that on this same date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all participants and attorneys of record.

RESPECTFULLY SUBMITTED in San Juan, Puerto Rico on this 3rd day of September, 2009.

ANTONIO M. SAGARDÍA DE JESÚS
Secretary of Justice

GRISSEL SANTIAGO CALDERÓN
Deputy Secretary for Litigation

WANDYMAR BURGOS VARGAS
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